

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LEARNING RESOURCES, INC., and  
HAND2MIND, INC.,

Plaintiffs-Appellees,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, et al.,

Defendants-Appellants.

No. 25-5202

**MOTION FOR AN EXTENSION OF TIME**

The government respectfully requests a ten-day extension, to August 18, of the deadline to file its reply brief. Plaintiffs take no position on this motion.

1. This is a challenge to tariffs imposed under the International Emergency Economic Powers Act (IEEPA). The district court preliminarily enjoined the enforcement of the tariffs against plaintiffs. The government appealed. On June 18, the Court granted plaintiffs' motion to expedite the appeal. The Court directed that the opening brief be filed by June 27, the response brief by July 23, and the reply brief by August 8, and directed the

Clerk to calendar argument “on the first appropriate date following the conclusion of briefing.” The Clerk subsequently set argument for September 30.

2. Given that argument will not take place until September 30, the government respectfully requests an additional ten days of time – until August 18 – to file its reply brief. An extension is warranted given the other matters, including related matters, with which counsel have been engaged during the reply briefing period.

3. In particular, counsel have been involved in the preparation of two response briefs, filed July 28, in related cases in the Ninth Circuit (*California v. Trump*, No. 25-3493, and *Webber v. DHS*, No. 25-2717), and in preparation for oral argument on July 31 in related cases in the Federal Circuit (*V.O.S. Selections, Inc. v. Trump*, No. 25-1812, and *Oregon v. Trump*, No. 25-1813). Other matters for which counsel are personally responsible include an August 11 oral argument in the Eleventh Circuit (*Florida Agency for Health Care Administration v. CMS*, No. 24-10875) and an August 21 response brief in the Federal Circuit (*Bennett v. United States*, No. 25-1171). Mr. Raab, Mr. Hinshelwood, and Mr. Winik have supervisory responsibility for other pending matters. And all four counsel have taken or plan to take leave for previously scheduled travel during the reply briefing period.

4. As noted above, plaintiffs take no position on this request.

Respectfully submitted,

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/s/ Brad Hinshelwood

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## CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 328 words. This brief also complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 32(a)(5)-(6) because it was prepared using Word for Microsoft 365 in 14-point Book Antiqua, a proportionally spaced typeface.

/s/ Brad Hinshelwood

Brad Hinshelwood